

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

TIMOTHY JACKSON,  
*Plaintiff,*

v.

LAURA WRIGHT, et. al.,  
*Defendants.*

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Civil Action No. 4:21-cv-00033

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**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION TO FILE A RESPONSE  
TO PLAINTIFF'S DISCOVERY MOTION [DKT. 7]**

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Defendants file this unopposed motion requesting a seven-day extension to April 6, 2021, of deadline to file a response to Plaintiff's Motion for Expedited Discovery or, in the Alternative, Petition to Conduct Depositions to Perpetuate Testimony (the "Discovery Motion") [Dkt. 7]. In support of this request, Defendants state the following:

1. Plaintiff filed his Original Complaint on January 14, 2021.
2. On March 9, 2021, Plaintiff filed his Discovery Motion. Plaintiff relied on the Court's CM/ECF system for service of the motion on Defendants but because Defendants had not yet appeared in this case at that point Defendants did not receive service of the Discovery Motion. On March 16, 2021, Plaintiff served Defendants with the Discovery Motion and filed an amended certificate of service reflecting the same [Dkt. 9]. Defendants' response deadline is currently March 30, 2021.
3. The undersigned counsel seeks a seven-day extension of the deadline to file Defendants' response to Plaintiff's Discovery Motion to April 6, 2021.

4. Federal Rule of Civil Procedure 6(b)(1)(A) provides that the Court may extend filing deadlines at its discretion. Between the time of service of the Discovery Motion and the deadline to respond, undersigned counsel has had multiple deadlines to file briefing in other matters as well as pre-planned family vacation. The undersigned counsel seeks this extension of time for good cause shown and in the interest of justice, and not to cause unnecessary delay. No party will be prejudiced if the extension sought herein is granted.

5. Plaintiff's counsel has been contacted regarding the substance of this motion and has confirmed that he does not oppose the extension.

6. For the reasons stated above, Defendants request that this Court extend the deadline to file a response to Plaintiff's motion for expedited discovery to April 6, 2021.

Respectfully submitted,

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/s/ Matthew Bohuslav  
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**CERTIFICATE OF CONFERENCE**

I, the undersigned attorney, hereby certify to the Court that on March 23, 2021, opposing counsel, Jonathan F. Mitchell, was contacted regarding this motion and he indicated that Plaintiff does not oppose the requested relief.

/s/ Matthew Bohuslav  
MATTHEW BOHUSLAV  
Assistant Attorney General

**CERTIFICATE OF SERVICE**

I hereby certify that on the 25th day of March, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which automatically provided notice to the following CM/ECF participants:

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